

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

RENEE M. BUTZ,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civ. No. 05-495-JJF
	)	Judge Joseph J. Farnan Jr.
LAWNS UNLIMITED, LTD. and	)	
EDWARD FLEMING,	)	
	)	
Defendants,	)	

**PLAINTIFF'S RESPONSE TO DEFENDANTS'  
MOTION TO COMPEL DISCOVERY RESPONSES**

Plaintiff Renee Butz makes the following responses to Defendants' Edward Fleming and Lawns Unlimited, LTD's Motion to Compel Discovery Responses.

**General Responses and Objections**

Plaintiff objects in total to Defendants' Motion to Compel Discovery Responses due to the fact that Defendants' have in their possession all documents which were previous provided to Defendants' counsel through Initial Disclosures.

Plaintiff objects to production of documents through Discovery as overly burdensome to reproduce and provide such documents to Defendants'.

1. Agreed
2. Plaintiff served answers to the Defendants First set of Interrogatories.
3. Agreed that Plaintiff makes multiple objections. Not agreed that the objections are baseless.

4. RE: No 9 Plaintiff maintains that income received during the last five years remains irrelevant to this case. RE: No 12 Plaintiff can not provide Cecil County Government manuals, handbooks, etc under the employment guidelines of Cecil County Government.

5. RE: No 8 Plaintiff was unable to seek medical treatment for the emotional injuries resulting from Plaintiff's unlawful termination of employment due to the fact that Defendants' canceled Plaintiff's health insurance. RE: No 10 Plaintiff provided Defendants' counsel with employment seeking information through Initial Disclosures.

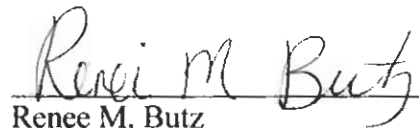
6. Plaintiff objects to production of documents through Discovery as overly burdensome to reproduce and provide such documents to Defendants' due to the fact that this information was previous provided.

7. Defendants' counsel misunderstood the Plaintiff's requirements with the regards to copying charges of the DDOL file. Plaintiff requested \$30 administrative fee plus \$.30 per page. Plaintiff has provided all DDOL documents not previously provided in Initial Disclosures.

8. Plaintiff maintains that information requested under Interrogatories No 10, 13, and 16 remain irrelevant to this case.

9. Plaintiff's answers to Interrogatories No 12, 14, 15, and 18 were complete or had previously been provided in Initial Disclosures.

10. As pro se, it is unclear what Defendants' counsel is stating.

A handwritten signature in cursive script that reads "Renee M Butz". The signature is written in black ink and is positioned above the printed name and address.

Renee M. Butz  
58 Hickory Drive  
North East, MD 21901  
(410)441-4300  
Plaintiff pro se

Dated: 5/5/07

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LAWNS UNLIMITED LTD. and  
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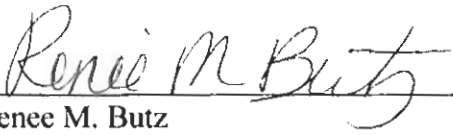
Defendants.

Civ. No. 05-495-JJF  
Judge Joseph J. Farnan Jr.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Plaintiff's Response to Defendants' Motion to Compel Discovery Responses were sent by first-class United States mail, postage duly paid, on this 5 day of May, 2007, to counsel of record as follows:

Margaret M. DiBianca  
Young Conaway Stargatt & Taylor, LLP  
The Brandywine Building, 17<sup>th</sup> Floor  
1000 West Street  
Wilmington, DE 19801

  
\_\_\_\_\_  
Renee M. Butz  
58 Hickory Drive  
North East, MD 21901  
(410) 441-4300  
Plaintiff pro se

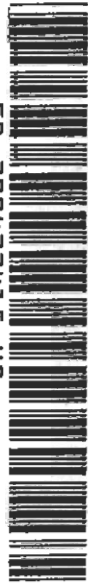
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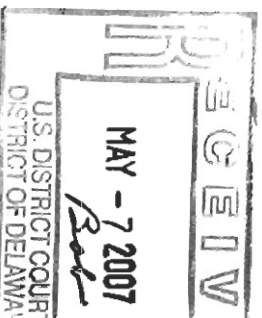
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Renee Butz  
58 Hickory Dr.  
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